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3 One Liberty Plaza
4 New York, NY 10006
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APR - 2 2015	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

11 NML CAPITAL, LTD.,
12 Plaintiff,
13 vs.
14 REPUBLIC OF ARGENTINA,
15 Defendant.

Case Nos. 2:14-cv-00492-RFB-VCF
2:14-cv-01573-RFB-VCF
2:14-ms-00024

Judge: Richard F. Boulware, II
Magistrate Judge: Cam Ferenbach
**MOTION TO BE REMOVED
FROM THE DOCKETS AS
COUNSEL OF RECORD**

20
21 Based on the attached Declaration of Carmine D. Boccuzzi, Carmine D.
22 Boccuzzi respectfully makes this motion to be removed from the dockets of these
23 proceedings as counsel of record. Movant also respectfully request that he not be
24 deemed in violation of Local Rule IA 10-2 and Special Order 109, and accordingly
25 that he be excused from taking the steps necessary to be admitted to practice in this
26
27
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1 case, including the submission of a Verified Petition and registration for CM/ECF
2 by completing an Attorney Registration Form.

3
4
5 Dated: April 1, 2015

CLEARY GOTTlieb STEEN &
HAMILTON LLP

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7
8 

Carmine D. Boccuzzi

9 One Liberty Plaza
10 New York, New York 10006
11 (212) 225-2000

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15 IT IS SO ORDERED.

16 

17 UNITED STATES MAGISTRATE JUDGE

18 DATED: April 29, 2015
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CLEARY GOTTlieb STEEN & HAMILTON LLP

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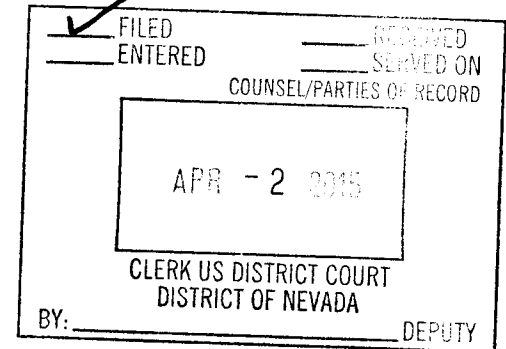
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WALLACE L. LARSON, JR.
JAMES D. SMALL
AVRAM E. LUFT
ELIZABETH LENAS
DANIEL ILAN
RESIDENT COUNSEL

April 1, 2015

BY FEDEX

The Honorable Lance S. Wilson, Clerk of the Court
U.S. District Court for the District of Nevada
333 Las Vegas Blvd. South, Room 1334
Las Vegas, Nevada 89101



Re: *NML Capital, Ltd. v. Republic of Argentina*, 14 Civ. 492 (RFB); *NML Capital, Ltd. v. Republic of Argentina*, 14 Civ. 1573 (RFB); *NML Capital, Ltd. v. Republic of Argentina*, 14 Misc. 24 (RFB)

Dear Mr. Wilson:

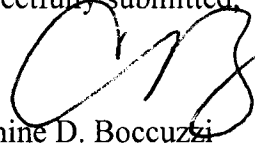
Pursuant to the verbal instructions given by your office to Brendan Cyr, the Assistant Managing Attorney at my law firm, Cleary Gottlieb Steen & Hamilton LLP, I enclose one copy of the following documents in response to the Minute Order, dated March 18, 2015, of the Honorable Judge Richard F. Boulware, in *NML Capital, Ltd. v. Republic of Argentina*, 14 Civ. 492 (RFB) (ECF No. 103):

- Motion to be Removed From the Dockets as Counsel of Record, dated April 1, 2015;
- Declaration of Carmine D. Boccuzzi in Support of the Motion to be Removed From the Dockets as Counsel of Record, dated April 1, 2015; and,
- Certificate of Service of Brendan Cyr, dated April 1, 2015.

Hon. Lance S. Wilson, p. 2

I submit these documents in hardcopy by mail because I am not a registered user of the U.S. District Court for the District of Nevada's ECF system. (I have not sought registration because, as explained in the above papers, I am not counsel of record in the above-listed matters.)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'CB', is written over the printed name.

Carmine D. Boccuzzi

Enclosures

cc: Counsel of Record

1 CARMINE D. BOCCUZZI
2 CLEARY GOTTlieb STEEN & HAMILTON LLP
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2:14-cv-01573-RFB-VCF
2:14-ms-00024

Judge: Richard F. Boulware, II

Magistrate Judge: Cam Ferenbach

**DECLARATION OF CARMINE D.
BOCCUZZI**

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19 Pursuant to 28 U.S.C. § 1746, Carmine D. Boccuzzi declares as follows:

- 20
21 1. These proceedings concern discovery that plaintiff NML Capital, Ltd.
22 (“NML”) seeks from various third parties, and include NML’s motion to compel
23 the production of documents from third parties and a third party’s motion to quash a
24 subpoena served by NML.
25
26 2. The Republic of Argentina (the “Republic”) has not appeared in these
27 proceedings. Accordingly, I have never been authorized to appear as counsel to the
28

1 Republic in these actions.

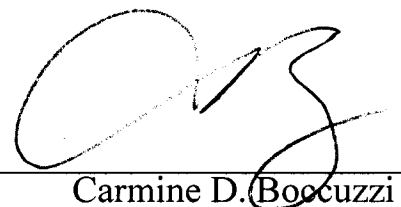
2
3 3. It appears I was inadvertently listed as counsel of record because a letter that
4 plaintiffs sent to the Court, dated April 1, 2014, identified me as counsel of record
5 in a related action in the District Court for the Southern District of New York (the
6 "SDNY Action"). See Letter of Mr. Lenhard to District Court Clerk, dated April 1,
7 2014 [ECF No. 1:10].

8
9 3. While it is true that I am counsel to the Republic in the SDNY Action, my
10 representation of the Republic does not extend to these proceedings, as the Republic
11 has not appeared in them. I have not filed a notice of appearance or otherwise acted
12 on behalf of the Republic in the matters pending before this Court.

13
14 4. Accordingly, because I have never been counsel of record in these
15 proceedings, I respectfully request that the Court grant my motion to remove from
16 the dockets of these proceedings my designation as counsel of record. I also
17 respectfully request that I not be deemed in violation of Local Rule IA 10-2 and
18 Special Order 109, and accordingly that I be excused from taking the steps
19 necessary to be admitted to practice in this case, including the submission of a
20 Verified Petition and registration for CM/ECF by completing an Attorney
21 Registration Form.

22
23
24 Dated: April 1, 2015

25
26
27
28



Carmine D. Boccuzzi

CARMINE D. BOCCUZZI
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New York, NY 10006
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NML CAPITAL, LTD.,
Plaintiff,

vs.

REPUBLIC OF ARGENTINA,
Defendant.

Case No. 2:14-cv-01573-RFB-VCF
Case No. 2:14-cv-00492-RFB-VCF
Case No. 2:14-ms-00024

CERTIFICATE OF SERVICE

I, Brendan Cyr, an attorney admitted to practice before the Courts of the State of New York, and the Assistant Managing Attorney of the firm of Cleary Gottlieb Steen & Hamilton LLP, hereby certify that:

1. On the 1st day of April 2015, the Motion to Withdraw as Counsel of Record and the Declaration of Carmine D. Boccuzzi are being served by First Class Mail, upon:

Nikki L. Baker
Kirk B. Lenhard
Emily A. Ellis
Brownstein Hyatt Farber Schreck, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106

1 Aaron R. Maurice
2 Jason M. Wiley
3 Kolesar & Leatham
4 400 South Rampart Boulevard, Suite 400
5 Las Vegas, NV 89145

6 Dennis H. Hranitzky
7 Dechert LLP
8 1095 Avenue of the Americas
9 New York, NY 10036

10 Marc J. Randazza
11 Randazza Legal Group
12 3625 South Town Center Drive, Suite 150
13 Las Vegas, NV 89135

14 Kent P. Woods
15 Woods Erickson & Whitaker LLP
16 1349 West Galleria Drive, Suite 200
17 Henderson, NV 89014

18 Frank M Flansburg , III
19 Schwartz Flansburg PLLC
20 6623 Las Vegas Boulevard
21 Suite 300
22 Las Vegas, NV 89119

23 2. This service is being made by an assistant managing clerk of this
24 firm under my general supervision.

25 Dated: New York, New York
26 April 1, 2015

27 
28 _____
Brendan Cyr

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NML CAPITAL, LTD.,

Plaintiff,

v.

REPUBLIC OF ARGENTINA,

Defendant.

CERTIFICATE OF SERVICE

CLEARY GOTTLEIB STEEN & HAMILTON LLP

ONE LIBERTY PLAZA
BOROUGH OF MANHATTAN
NEW YORK, N.Y. 10006
(212) 225-2000

COPY RECEIVED

THIS _____ DAY OF _____ 20____

Case No. 2:14-cv-01573-RFB-VCF
Case No. 2:14-cv-00492-RFB-VCF
Case No. 2:14-ms-00024

CLEARY GOTTLIB STEEN & HAMILTON LLP
ONE LIBERTY PLAZA
NEW YORK, NY 10006-1470

TO:

VIA FEDEX

Hon. Lance S. Wilson, Clerk of the Court
United States District Court
District of Nevada
333 Las Vegas Blvd. South, Room 1334
Las Vegas, Nevada 89101